

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	Case No. 4:19-cv-00415
v.)	
)	Filed Electronically
ALEXANDRU BITTNER,)	
Defendant.)	

**DEFENDANT ALEXANDRU BITTNER'S UNOPPOSED MOTION FOR EXTENSION
TO REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Defendant, Alexandru Bittner, by his undersigned counsel, respectfully moves the Court to extend the deadline for Defendant to reply to Plaintiff's response to Defendant's Motion for Partial Summary Judgment and in support thereof, states:

1. On April 2, 2020, the Parties submitted a joint motion to extend the deadlines to respond to their cross motions for partial summary judgments (Doc. 43).

2. April 3, 2020, the Court granted the Parties' joint motion to extend (Doc. 44). Accordingly, the Parties' response dates were extended to April 17, 2020.

3. However, on April 2, 2020, Plaintiff filed its response to Defendant's motion (Doc. 42). Under Local Rule CV-7(f), Defendant's reply to that response is now due April 9, 2020 (seven days from the date the response was served).

4. As a result of the above, Defendant is left with the unusual result of having his reply due approximately a week in advance of his extended response date.

5. Additionally, as noted in the previous joint motion to extend (Doc. 43), Defendant's counsel is currently focused on clients' immediate needs related to the recently

passed Families First Coronavirus Response Act and the Coronavirus Aid, Relief, and Economic Security Act.

6. For these reasons, Defendant requests that his reply deadline be extended to April 24, 2020 (seven days after the extended deadline granted for the Parties to file their responses).

7. The request is not made for delay but to allow Defendant's counsel adequate time to advocate for their client.

8. Defendant's counsel has conferred with Plaintiff's counsel, and Plaintiff does not oppose the extension requested.

WHEREFORE, Defendant respectfully requests the Court to grant this Motion.

Dated: April 7, 2020

Respectfully submitted,

CLARK HILL STRASBURGER

By: /s/ Farley P. Katz

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 7, 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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